

C. REMARKS**Status of the Claims**

Claims 8 - 27 are currently present in the Application, and claims 8, 15, and 21 are independent claims. Claims 1 - 7 have been canceled in response to a final restriction requirement. No claims have been amended or added in this Response.

Examiner Interview

Applicant's undersigned representative called Examiner Hassan on March 21 to request a telephonic interview and subsequently submitted an interview request form (PTOL-413A), as requested by the Examiner. On March 29, Examiner Hassan called Applicant's attorney and informed him that the Examiner's supervisor was unavailable for the interview until sometime in April. Applicant's attorney indicated that this Response would have to be submitted without benefit of an Examiner Interview due to the unavailability of Examiner's supervisor. During the telephone discussion, Applicant's attorney informed Examiner Hassan that the art cited by the Examiner was inapplicable to Applicant's claimed invention and that no claims were being amended. Applicant's attorney invited Examiner Hassan to telephone if he had any questions or if such a discussion would aid in the Examiner's understanding of Applicant's claimed invention.

Drawings

Applicant notes with appreciation the Examiner's acceptance of Applicant's formal drawings filed with the application.

Claim Rejections - Alleged Anticipation Under 35 U.S.C. § 102

Claims 8 - 27 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated, and therefore unpatentable, over U.S. Patent No. 6,366,109 to Shigeru Matsushita (hereinafter "Matsushita"). Applicant respectfully traverses the rejections.

In order to anticipate under 35 U.S.C. § 102, the Matsushita reference must teach each and every element as set forth in Applicant's claims. MPEP § 2131, citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As discussed below, it is readily apparent that Matsushita falls well short of this requirement.

In Applicant's independent claims, Applicant claims a method, information handling system, and computer program product that each include limitations of:

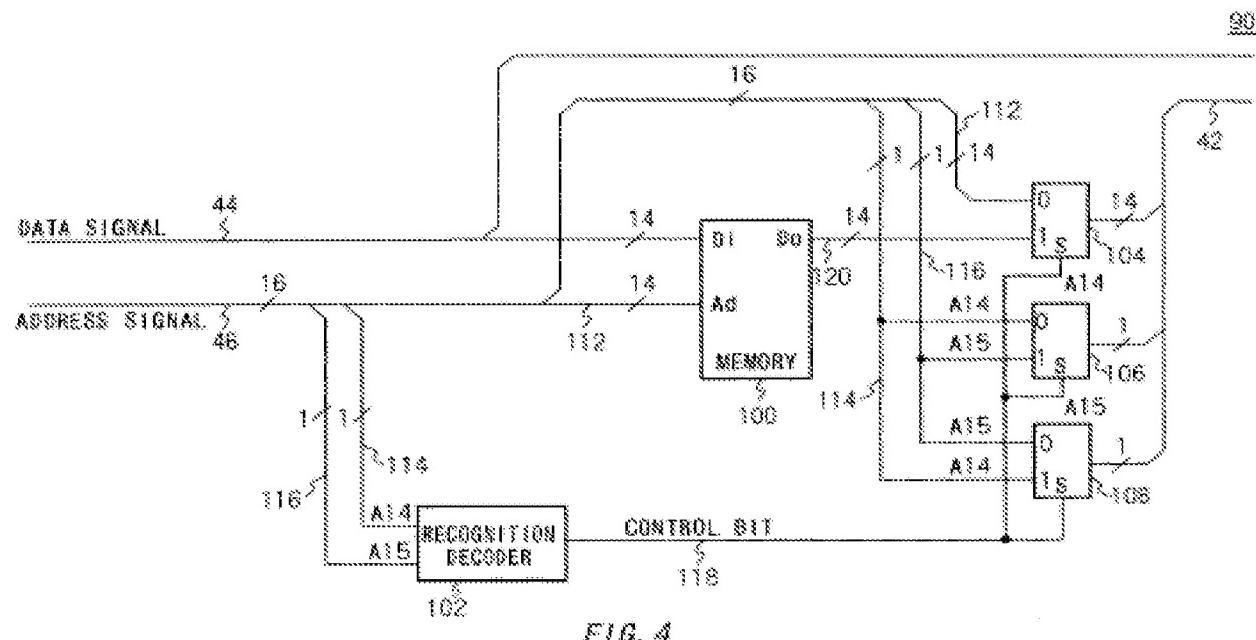
- receiving a first assignment request;
- identifying one or more interface pins that correspond to the first assignment request;
- selecting a first interface controller from a plurality of interface controllers that correspond to the first assignment request; and
- associating the identified interface pins with the selected interface controller.

In contrast to the limitations claimed in each of Applicant's independent claims, Matsushita teaches a semiconductor device testing system that, among other shortcomings, simply does not teach "selecting ... [an] interface controller..." nor does Matsushita teach or suggest Applicant's

claimed limitation of "associating the identified interface pins with the selected interface controller."

The Office Action contends that Matsushita teaches these limitations. However, as discussed below, the Office Action's reliance on Matsushita is misplaced.

Matsushita teaches "a semiconductor testing device for testing a semiconductor with a plurality of pins by applying a test signal." Figure 4 of Matsushita shows a configuration of Matsushita's pin assignment converter:



The Office Action contends that Matsushita teaches Applicant's claimed limitation of "selecting a first interface controller from a plurality of interface controllers that correspond to the first assignment request," citing Matsushita's multiplexers (104, 106, and 108). While multiplexers are used for selecting data, the multiplexers used by Matsushita do not teach anything regarding selecting an "interface controller from

a plurality of interface controllers," as claimed by Applicant. Instead, Matsushita uses the multiplexers to either replace an address signal (46) with output data (120), or leave the addresses unchanged (Matsushita, col. 6, lines 36-57). In this manner, Matsushita teaches that different semiconductor devices can be tested by replacing the pin assignment data in the pin map memory (col. 6, line 58 - col. 7, line 4).

While Matsushita may teach a system for testing semiconductor chips that are packed in different types of packages using the same test vectors and test programs (col. 6, lines 57-60), Matsushita teaches nothing regarding selecting an "interface controller from a plurality of interface controllers," as taught and claimed by Applicant. It follows that, because Matsushita is void of any teaching regarding selecting interface controllers, Matsushita is also void of any teaching regarding associating identified interface pins with a selected interface controller.

The Office Action contends that Matsushita's "recognition decoder" is analogous to Applicant's interface controller. This contention is faulty for a number of reasons. Two of these reasons are set forth below. First, Matsushita's recognition decoder "activates the control bit (118), which is fed into all the multiplexers..." Therefore, such a "recognition decoder" is simply not synonymous with an interface controller. Second, Applicant claims selecting an interface controller from a plurality of interface controllers. Even if the recognition decoder was analogous to an interface controller, Matsushita does not teach selecting the recognition decoder from a plurality of such decoders. Therefore, Matsushita's "recognition decoder" is not analogous or in anyway

interchangeable with Applicant's claimed "interface controller" that is selected from a plurality of interface controllers.

Matsushita clearly fails to anticipate Applicant's claimed invention. As described above, Matsushita fails to teach or suggest at least two of Applicant's claimed limitations found in each of Applicant's independent claims. Therefore, claims 8, 15, and 21 are each allowable over Matsushita.

Each of the remaining claims depends, directly or indirectly, on an allowable independent claim. Therefore, each of the dependent claims are also allowable for at least the same reasons as the independent claims are allowable.

Conclusion

As a result of the foregoing, it is asserted by Applicants that the remaining claims in the Application are in condition for allowance, and Applicants respectfully request an early allowance of such claims.

Applicants respectfully request that the Examiner contact the Applicants' attorney listed below if the Examiner believes that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

By



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